

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ANONYMOUS MEDIA RESEARCH
HOLDINGS, LLC,

Plaintiff,

V.

SAMSUNG ELECTRONICS CO, LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

[illegible]

Case No. 2:23-CV-00439-JRG-RSP

Jury Trial Demanded

DECLARATION OF LOUIS LIAO

I, Louis Liao, declare as follows:

1. My name is Louis Liao. I am over the age of eighteen, I am of sound mind, and I am fully competent to testify herein. I have personal knowledge of the facts set forth herein, or if so stated, I am informed and believe of their truth and accuracy and, if called to testify, I could and would do so competently and under oath.
2. I am an attorney with the AZA law firm and represent the Plaintiff, Anonymous Media Research Holdings, LLC (“AMRH”) in the above captioned case. I am submitting this declaration in support of Plaintiff Anonymous Media Research Holdings, LLC’s Opening Claim Construction Brief.
3. Attached as **Exhibit 1** is a true and accurate copy of U.S. Patent No. 8,296,791 (the “’791 Patent”), one of the asserted patents in this action.
4. Attached as **Exhibit 2** is a true and accurate copy of U.S. Patent No. 8,510,768 (the “’768 Patent”), one of the asserted patents in this action.
5. Attached as **Exhibit 3** is a true and accurate copy of U.S. Patent No. 8,677,389 (the “’389 Patent”), one of the asserted patents in this action.
6. Attached as **Exhibit 4** is a true and accurate copy of U.S. Patent No. 8,756,622 (the “’622 Patent”), one of the asserted patents in this action.

7. Attached as **Exhibit 5** is a true and accurate copy of U.S. Patent No. 10,572,896 (the “’896 Patent”), one of the asserted patents in this action.
8. Attached as **Exhibit 6** is a true and accurate copy of U.S. Patent No. 10,719,848 (the “’848 Patent”), one of the asserted patents in this action.
9. Attached as **Exhibit 7** is a true and accurate copy of U.S. Patent No. 10,719,849 (the “’849 Patent”), one of the asserted patents in this action.
10. Attached as **Exhibit 8** is a true and accurate copy of U.S. Patent No. 10,963,911 (the “’911 Patent”), one of the asserted patents in this action.
11. Attached as **Exhibit 9** is a true and accurate copy of Defendants’ Patent Rule 4-1(A) Proposed Terms and Claim Elements for Construction, served on December 23, 2024, in this action.
12. Attached as **Exhibit 10** is a true and accurate copy of Defendants’ Preliminary Proposed Claim Constructions and Preliminary Identification of Extrinsic Evidence, served on January 23, 2025, in this action.
13. Attached as **Exhibit 11** is a true and accurate copy of a document with Bates labels SAM-AMRH-00013578–81, produced by Defendants in this action.
14. Attached as **Exhibit 12** is a true and accurate copy of a document with Bates labels SAM-AMRH-00013582–85, produced by Defendants in this action.
15. Attached as **Exhibit 13** is a true and accurate copy of the Declaration of W. Leo Hoarty, served on January 13, 2025 in this action.
16. Attached as **Exhibit 14** is a true and accurate copy of the Declaration of Dr. Benjamin Bederson, served on January 13, 2025 in this action.
17. Attached as **Exhibit 15** is a true and accurate copy of a document with Bates labels AMRH_SAMSUNG_00001455–61, produced by AMRH in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 21, 2025.

/s/ Louis Liao
Louis Liao